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December 9, 2013

Honorable Jesse M. Furman United States District Judge United States District Court 40 Foley Square New York, New York 10007

> Re: United States v Andrew Chang, 13 Cr. 461(JMF)

Dear Judge Furman:

I write to request a bail hearing on behalf of my client Andrew Chang tomorrow after the conference in this matter to appeal the decision of Magistrate James C. Francis denying the defendant's application for bail. Judge Francis denied the application based upon the strength of the evidence in this case, which included recordings pertaining to drug transactions alleged to involve my client. In addition the court concluded that my client was a risk of flight.

The defendant submitted a bail package to Judge Francis which included the proposal of a \$150,000 bond co-signed by his sister, who is employed at a bank, collateral in the amount of \$10,000 and a cooperative apartment with a value and equity of \$225,000, which is owned by the defendant's sister.

The government opposed this application.

Thank you for your consideration of this request.

Respectfully yours,

/s/

Thomas F.X. Dunn

Cc: Sean Buckley, AUSA (by ECF & email)

The Court will hold a bail hearing after the conference scheduled for December 10, 2013. The parties shall make any written submissions by noon tomorrow. The Government shall notify Pretrial Services and arrange for the Court to obtain a copy of the Pretrial Services Report. SO ORDERED.

December 9, 2013